Message

From: Fruitwala, Kishor [Fruitwala.Kishor@epa.gov]
Sent: 7/16/2018 2:15:17 PM
To: Luschek, Robert [Luschek.Robert@epa.gov]; Shah, Harry [shah.harry@epa.gov]; Galbraith, Michael [Galbraith.Michael@epa.gov]; Tidmore, Guy [tidmore.guy@epa.gov]; Atagi, Tracy [Atagi.Tracy@epa.gov]; Tidmore, Guy [tidmore.guy@epa.gov]; Toups, Brad [Toups.Brad@epa.gov]; Peace, Michelle [Peace.Michelle@epa.gov]; Young, Jessica [Young.Jessica@epa.gov]; Thompson, Steve [thompson.steve@epa.gov]
Subject: FW: Thermaldyne Process Discussion pfd
Attachments: Thermaldyne PFD Rev 1.pdf

Hi All,

Please see email/attachment below from US Ecology for discussion at 1 pm (central) time today. The agenda and call-in info (from US Ecology) is also provided below.

Thank you.

Kishor

Kishor Fruitwala, Ph.D., P.E.
Acting Associate Director for RCRA
Multimedia Division, EPA Region 6
214-665-6669

From US Ecology:

1. Go over Heat & Material Balance for Thermaldyne with and without emission limits.
Three cases: mercury, arsenic and hydrochloric acid.

2. Open discussion.

Please use the following GoToMeeting call-in. We will share PFD and H&M Balance screens, so joining meeting thru the web interface will allow you to see these on your computer. The phone number gives the best voice contact, so that is recommended.

TCEQ/EPA - US Ecology / TD*X

Please join my meeting from your computer, tablet or smartphone.
https://global.gotomeeting.com/join/524090725

You can also dial in using your phone.
United States [redacted]

Access Code: [redacted]

First GoToMeeting? Let's do a quick system check: https://link.gotomeeting.com/system-check

From: Carl Palmer [mailto:cpalmer@tdxassociates.com]
Sent: Monday, July 16, 2018 8:08 AM
To: Fruitwala, Kishor ; Tidmore, Guy ; Luschek, Robert ; Young, Jessica ; Shah, Harry ; Galbraith, Michael
Cc: Gregg Meyers ; George Hay ; Brian Lindman
Subject: Thermaldyne Process Discussion pfd

We have prepared a heat and material balance for the Thermaldyne process as proposed for hazardous waste thermal treatment in Louisiana. It is attached. This PFD will be the primary material that we discuss on the call this afternoon.

We will also discuss the fact that in the variance as written by LDEQ, listed waste codes do not apply to 85% of the feed material that is generated as residuals from the hazardous waste recycling. This is contrary to the rulemaking for refinery OBHSM [261.4(a)(12)] that clearly states that all residuals from refinery OBHSM recycling are listed waste F037. The variance as written by LDEQ states:

> *... Thermaldyne shall make a hazardous waste determination on any residuals generated from the reclamation of the OBHSM. The residuals are a point of new generation of material. Upon intent to be discard the residuals must be properly characterized and managed in accordance with Louisiana Solid Waste and/or Hazardous Waste Regulations as applicable.*

The most likely interpretation of the above condition will be that TDU desorber solids will be tested for hazardous waste characteristics (D codes) and if below those levels will be discarded as non-hazardous industrial solid waste, at most. They will not be tested for LDR compliance for either F037 criteria, or UTS UHC criteria. This could also be done for the centrifuge cake that is not "reclaimed" in the TDU but rather simply discarded after centrifuging. Also, waste water that is spilled or otherwise discarded would not be subjected to F037 waste-water LDR testing.

We'll talk at 1 Central.

Carl

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Carl R. Palmer, P.E.
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